

From: [Polly Parks](#)
To: [Olin, Joyce](#); [Noggle, William](#)
Cc: [Jason Glascock](#); [Chris Green](#); [Randy Boudreaux](#); [Robert Berry](#); [Tony Schultz](#); [Tara Tomasiewicz](#)
Subject: The MV Miller Freeman (NOAA) and Navy 65 Non-Standard vessel
Date: Thursday, January 16, 2014 10:46:51 AM
Importance: High

Dear Joyce and Bill;

Our environmental specialists are asking the following questions concerning the Miller Freeman vessel (and they would be applicable to the Navy 65 Non-Standard though no claim of pcb removal is in that offer):

All PCBs removed? That would mean the entire ship was re-wired...think that actually happened?

"ALL KNOWN AND SUSPECTED PCBS (POLYCHLORINATED BIPHENYLS) HAVE BEEN REMEDIATED"?

Electrical cable samples? Vent. Gasket samples?, rubber gasket samples? Shipyard specs stating that all electrical cable, gaskets, calking, rubber, etc. was removed?

More than likely they have a document that states all liquid PCBs (capacitors, transformers, rectifiers, ballasts, etc.) were removed and does not address suspect solid PCB items. Ship is located in Seattle, I was contracted to sample a deck barge in Seattle for Crowley in 2011 due to EPA export interest; so EPA Region 10 may understand TSCA PCB requirements regarding ship export. The export/re-flagging guidance document is now in effect and I am sure that NOAA has not conducted the sampling required by this guidance.

http://www.epa.gov/epawaste/hazard/tsd/pcbs/pcb_shp_guidnce.htm
<http://www.epa.gov/epawaste/hazard/tsd/pcbs/pcb_shp_guidnce.htm>

<http://gsaauctions.gov/gsaauctions/aucdsclnk?sl=41QSCI14821001>
<http://gsaauctions.gov/gsaauctions/aucdsclnk?sl=31QSCI14071001>

Has the EPA signed off on these sales? Are these vessels subject to the MOA's with the Maritime Administration? What role would ITAR play with the 65' Non-Standard vessel at Key West?

The Miller Freeman is particularly odd as the vessel was apparently just listed last week and bids are due tomorrow. While the GSA website states that current bids do not meet the Reserve Price, GSA let that ghost company, that ended up fronting for the Mexican yard, take the Storis at significantly less than Reserve Price.

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